

REMARKS

In the Office Action dated May 9, 2001, the Office rejected claims 1-15 and 17-27 and objected to claim 16. This Reply cancels claims 22-23 and amends claims 24 and 26. After entry of the foregoing amendments, claims 1-21 and 24-27 (4 independent claims; 25 total claims) remain pending in the application. Reconsideration is respectfully requested.

Preliminary matters

The Office states that the Information Disclosure Statement ("IDS") submitted with the application as filed fails to comply with 37 C.F.R. § 1.98(a)(3). Applicants respectfully point out that section 1.98(a)(3) states that an IDS must include a "concise explanation of the relevance . . . of each patent, publication, or other information listed ***that is not in the English language.***" Applicants assert that a concise explanation is therefore only needed if the cited reference is written in a language other than English. As each of the references listed in the IDS are U.S. patents that are written in English, Applicants respectfully submits that the requirements of section 1.98(a)(3) have been satisfied.

The Office objected to Figures 2, 3, and 4B. Applicants will submit a set of corrected drawing figures 2, 3, and 4B upon the receipt of a Notice of Allowance for this application.

The Office objected to claims 24 and 26 for various informalities. Applicants submit that claims 24 and 26, as amended, suffer from no informalities.

Section 112 rejections

The Office rejected claims 24-27 under 35 U.S.C. § 112, second paragraph as being indefinite. Applicants respectfully traverse this rejection. The Office appears to believe that claims 24 and 26 are contradictory. Applicants wish to point out that claims 24 and 26 are different embodiments of the present invention.

With respect to claim 24, lines 3-4 of claim 24 clearly states that "said module includes first and second guide holes astride a first connector." While the Office states that "to the best understood, -- said module includes first and second guide pins astride [a] first connector," the quoted phrase is from claim 26, a separate, independent claim.

In a similar manner, the quote cited by the Office with respect to claim 26 contains language from claim 24, a separate, independent claim.

Applicants assert that there is no contradiction between claims 24 and 26 because they illustrate distinct embodiments of the present invention.

Section 102 rejections

The Office rejected claims 1-15 and 17-19 under 35 U.S.C. § 102(b) as being anticipated by *Milan* (U.S. Patent 5,092,774, issued March 3, 1992).

The Office states that *Milan* discloses each of the claimed limitations of claim 1, specifically a rear plate of a tray with a first rear hole, a first fastener mounted in the first rear hole, a first spring mounted on the first fastener, a mounting plate attached to the connector, where the mounting plate is mounted on the first fastener and the first spring. However, while claim 1 recites an apparatus for mounting a connector to a tray, figure 2 of *Milan* does not disclose an apparatus for the **mounting** of a connector; it discloses

the ***internal structure*** of a connector (see Col. 5, lines 32-55; abstract; element 10). Furthermore, claim 1 specifically recites an apparatus for mounting a connector **to a tray**. There is no tray present in *Milan*.

Furthermore, it would not have been obvious for one skilled in the art to refer to *Milan* because *Milan* is specific to a device used to interconnect two circuit boards (see Col. 5, lines 33-36). One designing an apparatus for mounting a connector to a tray would have no motivation to refer to an interconnection between two circuit boards (*i.e.*, the *internal structure* of a connector), such as that described in *Milan*.

Therefore, Applicants assert that claim 1 is patentable over the cited references and respectfully request the removal of the rejection of claim 1.

As claims 2-19 variously depend from claim 1, Applicants assert that they are all patentable for the reasons set forth above.

The Office rejected claims 20-23 under 35 U.S.C. § 102(b) as being anticipated by *Nations* (U.S. Patent 5,391,091, issued February 21, 1999). Applicants respectfully traverse this rejection.

Claim 20 recites, *inter alia*, a module comprising a connector and a first guide hole. *Nations*, with reference to Figures 1 and 2, discloses a module (16) with a connector (2) and guide pins (6). *Nations* fails to show a module containing guide holes. Therefore, *Nations* fails to disclose every element of claim 20. Applicants respectfully request the removal of the rejection of claim 20 and claim 21, which depends from claim 20.

Applicants have cancelled claims 22-23, without disclaimer or prejudice, thus rendering the rejection of those claims moot.

The Office rejected claims 24-27 under 35 U.S.C. § 103(a) as being unpatentable over *Bittihn et al.* (U.S. Patent 5,538,809, issued July 3, 1996) in view of *Briggs et al.* (U.S. Patent 5,125,849, issued June 30, 1992). Applicants respectfully traverse this rejection.

The Office states that *Bittihn* discloses a method of providing a tray with a mating connector coupled to the tray by at least one spring and mounted between guide pins. The Office states that *Bittihn* lacks a module, but states that *Briggs* teaches a module with first and second guide holes astride a connector. The Office asserts that it would have been obvious to combine *Bittihn* with *Briggs* to come up with the present invention. Applicants respectfully traverse this rejection.

As an initial matter, the Office states that element 12 of *Briggs* teaches a module. However, Applicants assert that element 12 of *Briggs* is described as a "mounting structure" at column 2, line 15 of *Briggs* and as a "printed circuit board" in the Abstract of *Briggs*. Furthermore, column 1, lines 30-37 of *Briggs* state that an object of the invention is "to provide a guide means facilitating mounting of a connector half on a mounting structure *such as a printed circuit board* in a simple an novel manner." (emphasis added). Furthermore, the claims of *Briggs* are directed to a connector mounted on a circuit board. Applicants assert that the "mounting structure" or "printed circuit board" of *Briggs* is not equivalent to a module. It is obvious that *Briggs* is directed to a method of mounting a connector on a board such that other connectors can interface with the board. There is no discussion of modules or trays in *Briggs*.

Therefore, Applicants assert that the combination of *Bittihn* and *Briggs* fails to disclose a module for insertion into a tray and respectfully request the removal of the rejection of claims 24-27.

Applicants thanks the Office for the indication that claim 16 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claim. However, for the reasons stated above with respect to claim 1, from which claim 16 depends, Applicants assert that claim 16 is patentable as filed.

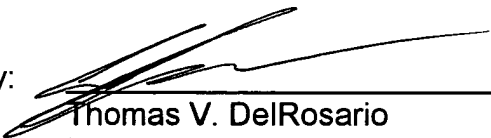
CONCLUSION

In view of the foregoing, Applicants believes that all of the pending claims fully comply with 35 U.S.C. § 112 and are allowable over the prior art of record. Therefore, reconsideration of the application and allowance of all pending claims is earnestly solicited. The Examiner is invited to telephone the undersigned at the number listed below to discuss any of the foregoing in greater detail or to otherwise expedite the prosecution of the application.

Respectfully submitted,

Date: August 9, 2001

By:


Thomas V. DelRosario
Reg. No. 46,658
Attorney for:
Honeywell International, Inc.
Law Dept. AB2
PO Box 2245
Morristown, NJ 07962-2245
(602) 382-6219
Fax: (602) 382-6070

MARKED UP VERSION SHOWING CHANGES MADE

Claims 22 and 23 were cancelled without disclaimer or prejudice.

Claims 24 and 26 were amended as follows:

24. (AMENDED) A method of mounting a module in a tray, said method comprising the steps of:

providing a module, wherein said module includes first and second guide holes astride a first connector;

providing a tray, wherein said tray includes a mating connector configured to accept said first connector, wherein said mating connector is coupled to said tray by at least one spring and wherein said mating connector is mounted between first and second guide pins;

inserting said module into said tray until said first and second guide holes mate with said first and second guide pins such that said first connector is aligned with said mating connector by said spring; and

further inserting said module into said tray ~~into said tray~~ until said first connector is seated inside said mating connector.

26. (AMENDED) A method of mounting a module in a tray, said method comprising the steps of:

providing a module, wherein said module includes first and second guide pins astride a first connector;

providing a tray, wherein said tray includes a mating connector configured to accept said first connector, wherein said mating connector is coupled to the rear of said tray with at least one spring and said mating connector is mounted between first and second guide holes;

inserting said module into said tray until said first and second guide holes mate with said first and second guide pins such that said first connector is aligned with said mating connector by said spring; and

further inserting said module into said tray ~~into said tray~~ until said first connector is fully seated inside said mating connector.